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December 13, 1982

Mr. Robert Carnahan  
Industrial Wastewater Coordinator  
Central Wastewater Treatment Plant  
1600 Second Avenue, North  
Nashville, TN 37208

Dear Mr. Carnahan:

As discussed by telephone on December 10, 1982, this letter and the enclosed analytical report are being submitted on behalf of Mr. Donald Cowan of Donald Cowan and Associates, P. O. Box 15607, Nashville, Tennessee 37215. Mr. Cowan is currently acting as agent for a company being formed to take over the operations of the facility previously operated by John P. Saad and Sons, Inc. located at 3655 Trousdale Drive. Further, this letter and the enclosed analytical report constitute a formal request for permission to discharge industrial wastewater from the Trousdale Drive facility into the Metropolitan Nashville Sewerage System.

The wastewater in question is currently in storage at the facility and is a result of the accumulation of water from within the facility's protective dikes. The total volume of wastewater in question is approximately 111,000 gallons and is currently stored in five different storage tanks. The approximate volumes of the five storage tanks are as follows: 18,525 gallons; 18,875 gallons; 31,125 gallons; 13,600 gallons and 28,825 gallons.

On November 24, 1982, I collected samples from each of the five storage tanks in question; a composit sample was prepared proportional to the tank volumes and analyzed consistent with the requirements of your office. The enclosed analytical report presents the results obtained from the composite sample. It should be noted that since November 24, 1982, additional water accumulated within the dikes has not been placed in the five tanks sampled. It is my opinion that the wastewater reflected by the enclosed analytical report can be discharged into the Metropolitan Nashville Sewerage System without creating any environmental or safety problems.

To accomplish this batch discharge of 111,000 gallons it is proposed to install a temporary manifold system to allow uniform, concurrent drainage for each of the five tanks and that the total discharge rate be limited to approximately 50 gallons per minute. Further, it is proposed that the wastewater be discharged into the sewerage system between the hours of 8:00 a.m. and 5:00 p.m. on normal working days until the tank contents are exhausted. This modulated discharge approach will serve to prevent any hydraulic problems in the collection system and will serve to further minimize any adverse environmental consequences. Additionally, it is proposed that

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during periods of discharge, the discharge will be visually inspected by Mr. Donald Cowan, Jr. at 30-minute intervals, and should there be manifested any abnormalities in the appearance of the wastewater, the discharge will be terminated. Also, during the approximate 4-day period required to accomplish the discharge, a representative of Resource Consultants on a twice-per-day frequency will randomly visit the site to ensure maintenance of the specified discharge rate and to collect a grab sample of the discharge. We do not propose to analyze the grab samples; however, they will be retained for analysis in the event later problems arise.

In summary, it is my considered, professional opinion that the discharge protocol outlined in this letter, in light of the characteristics of the wastewater in question, will allow the safe disposition of the wastewater. It is understood that Metro may apply its normal sewer use and surcharge costs to the wastewater in question and that representatives of your office may wish to periodically inspect the discharge as it occurs. As we discussed on December 10, 1982, I am requesting that this matter be evaluated as quickly as possible, and I am prepared to assist in any way you deem appropriate in order to expedite the issuance of a discharge permit. If you have any questions regarding this matter, please do not hesitate to contact me.

Very truly yours,

RESOURCE CONSULTANTS, INC.

*V. Wayne McCoy*

V. Wayne McCoy, P.E.  
Principal

VWM/mb

Enclosure

cc: Mr. Donald Cowan, w/encl. ✓  
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